

**EXHIBIT B**

**Declaration of Kumanan Ramanathan in Support of Plaintiffs' Motion**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD., WEST REALM SHIRES  
SERVICES, INC., and ALAMEDA RESEARCH  
LTD.,

Plaintiffs,

- against -

MIRANA CORP., BYBIT FINTECH LTD.,  
TIME RESEARCH LTD., SIN WEI “SEAN”  
TAN, WEI LIN “GERMAINE” TAN,  
WEIZHENG YE, and NASHON LOO SHUN  
LIANG,

Defendants.

Adv. Pro. No. 23-50759-JTD

**DECLARATION OF KUMANAN RAMANATHAN IN SUPPORT OF PLAINTIFFS’  
MOTION FOR ENTRY OF AN ORDER (A) AUTHORIZING THE PLAINTIFFS’  
ENTRY INTO, AND PERFORMANCE UNDER, THE SETTLEMENT AGREEMENT  
WITH DEFENDANTS, (B) APPROVING THE SETTLEMENT AGREEMENT, AND  
(C) GRANTING RELATED RELIEF**

I, Kumanan Ramanathan, declare under penalty of perjury:

1. I am a Senior Director at Alvarez & Marsal North America, LLC (“A&M”),  
a restructuring advisory services firm specializing in interim management, crisis management,

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. A list of Debtors and the last four digits of their tax identification numbers may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

turnaround consulting, operational due diligence, creditor advisory services, and financial and operation restructuring.

2. I have more than 14 years of restructuring and financial advisory experience across various industries, including oil and gas, industrials, manufacturing, pharmaceutical, retail, mining, lending, healthcare, and consumer products. I have a Bachelor's Degree from the University of Toronto and am a Chartered Accountant (CA).

3. Since joining A&M, I have been involved in numerous Chapter 11 restructurings, including Philadelphia Energy Solutions (2019), Endo International, Gibson Brands, Inc., M&G USA Corporation and USA Discounters Ltd.

4. I submit this declaration (the "Declaration") in support of the *Motion of the Debtors for Entry of An Order (A) Authorizing the Plaintiffs to Enter Into the Settlement Agreement with Defendants, (B) Approving the Settlement Agreement, and (C) Granting Related Relief* (the "Motion") filed concurrently herewith.<sup>2</sup>

5. Except as otherwise indicated herein, all of the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by A&M professionals involved in advising the Debtors in the above-captioned cases (the "Chapter 11 Cases"), or information provided to me by the Debtors. If called upon to testify, I could and would testify to the facts set forth herein on that basis. I am authorized to submit this Declaration on behalf of the Debtors.

6. Based on the Debtors' and their advisors' ongoing analysis and review, the following accounts were opened on the Bybit exchange (the "Accounts"):

- Account No. ending in 3162, held in the name of Plaintiff Alameda;

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<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

- Account No. ending in 6833, held nominally by Ninja Epoch Ltd.;
- Account No. ending in 6338, held nominally by Finfinity Apex Ltd.;
- Account No. ending in 2251, held nominally by King Sirius Ltd.;
- Account No. ending in 7848, held nominally by Fir Grove Enterprises Ltd.; and
- Account No. ending in 1701, held nominally by Whirl Casa Ltd.

7. Each of Ninja Epoch Ltd., Finfinity Apex Ltd., King Sirius Ltd., Fir Grove Enterprises Ltd. and Whirl Casa Ltd. was a nominee entity formed in the British Virgin Islands at the direction of FTX Group employees to be used for Alameda's trading activities. Although these entities were nominally owned by individuals associated with the FTX Group, the Accounts associated with each of these entities were at all relevant times funded and controlled by, and used solely for the benefit of, the Debtors and their subsidiaries.

8. The email addresses associated with each of the Accounts were set up to automatically forward all messages to [info@alamedaresearch.com](mailto:info@alamedaresearch.com), or used [info@alamedaresearch.com](mailto:info@alamedaresearch.com) as the recovery e-mail address. The Debtors also continue to be able to log into each of the Accounts.

9. For each of Ninja Epoch Ltd., Finfinity Apex Ltd. and King Sirius Ltd., I also have reviewed letters signed by the nominal owners of each entity in which those nominal owners (i) confirmed that any assets held in the names of those entities, including any assets in the associated Accounts, have always been and remain the property of the Debtors; and (ii) authorized representatives of the Debtors to take all necessary steps to secure the assets held in the associated Accounts.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 24, 2024

/s/ Kumanan Ramanathan

Kumanan Ramanathan  
Alvarez & Marsal North America, LLC  
Senior Director